

Harrison W. Long
Rawls Law Group
211 Rocketts Way, Suite 100
Richmond, VA 23231
wlong@rawlslawgroup.com
(904) 344-0038

William Weiss
140 Geary Street, 7th Floor
San Francisco, CA 94108
william.weiss@gmail.com
(415) 235-7060

Attorneys for Petitioner
SANDRA L. CAREY

PHILLIP A. TALBERT
Acting United States Attorney
JOSEPH B. FRUEH
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
E-mail: joseph.frueh@usdoj.gov
Telephone: (916) 554-2702
Facsimile: (916) 554-2900

Attorneys for Respondent
DEPARTMENT OF VETERANS AFFAIRS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SANDRA L. CAREY,

Petitioner,

v.

DEPARTMENT OF VETERANS AFFAIRS,

Respondent.

Case No. 2:21-MC-00014-WBS-AC

**STIPULATION AND ~~PROPOSED~~ ORDER
FOR (1) WITHDRAWING OPPOSITION TO
PETITION TO PERPETUATE TESTIMONY,
AND (2) CONSENTING TO DEPOSITION**

STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED, by and between the parties and subject to Court approval, that the Department of Veterans Affairs hereby withdraws its Opposition (ECF 8) to the Petition to Perpetuate Testimony (ECF 1) filed by Petitioner Sandra L. Carey. Having further met and conferred regarding the Petition and the parties' respective positions, the parties agree that the Court should enter the Proposed Order (ECF 1-1) attached to the Petition. The parties further agree that the taking of Ms. Carey's pre-litigation deposition to perpetuate her testimony will not preclude a subsequent deposition of Ms. Carey in the event that she proceeds to file a federal lawsuit against the United States under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b)(1), 2671-80.

Dated: April 8, 2021

RAWLS LAW GROUP

By: /s/ Harrison W. Long (authorized 4/8/2021)
Harrison W. Long

Attorneys for Petitioner
SANDRA L. CAREY

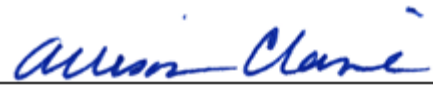
PHILLIP A. TALBERT
Acting United States Attorney

By: /s/ Joseph B. Frueh
JOSEPH B. FRUEH
Assistant United States Attorney

Attorneys for Respondent
DEPARTMENT OF VETERANS AFFAIRS

IT IS SO ORDERED

Dated: April 9, 2021


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE